To: Tina Laidlaw/MO/R8/USEPA/US@EPA[]
From: "Blend, Jeff"
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NWG presentation-Public Demonstration of Significant and Widespread Impact.pptx

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Public Demonstration of Significant and Widespread Impact

- DEQ determined all WWTPs that would be affected in Montana (108 out of about 200)
- Sample of 24-emphasis on large towns. Would cost of criteria result in economic hardship?
- Data: DEQ permits, engineers, WERF Study, EPA, MT CEIC, MT DLI, and WWTP operators.
- Used EPA 1995 Guidance to test significant and widespread impact to all affected WWTPs
- Result: Meeting Base Nutrient Criteria would cause economic hardship to MT WWTPs

Three Main Steps to Prove S&W Impact

1) Median House Income (MHI) Screener—2%

2) Economic Health of a Community—Secondary scores of five economic metrics

   – A matrix is used to determine if impacts are 'Substantial' based on Screener and Secondary Score

3) Widespread Impacts

Step 1: Median Household Income Screener

- Cost Simulation to reach WERF level 5
- 21 out of 24 sample towns scored above 2%
- Missoula already meets standards
- Helena and Lolo come in just below 2%
- It is assumed that the rest of 84 affect towns would also score above 2%--small lagoons
- Canned EPA language talking about how WERF level 5 does not get us to standards OR tweaking assumptions (labor costs, int rate)

Step 2: Secondary Score & Significance Finding

- Updated data for five economic indicators: Poverty rate, LMI, MHI, unemployment, local taxes
- These are compared to either the state average or the an average of a selected sample of 40+ towns
- Each metric is scored strong, mid-range or weak. The five scores are averaged for an overall ranking.
- Most of 24 towns fell into Mid range score per the Guidance (1.5 to 2.5)
- All towns fell into Significant finding on matrix

- Insert picture of the matrix
- Insert picture of where the 24 towns fell in the matrix.

Widespread Analysis

- What are the economic and social ripple effects of the substantial impact on the local area
- More than doubling on average of wastewater bills for average town
- Montana below U.S. average for MHI
- Small towns, already struggling, could be hit hard
- Recession and recovery concerns
- Changing standards targets, hard-to-find engineers, increased env impact in other vectors.
- Possibility that all WWTPs could shut down
- Widespread demonstrated